

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	No. 4:17 CR 380 RLW NAB
)	
DEANDRE LAJUAN JACKSON,)	
)	
Defendant.)	

MOTION FOR PRETRIAL DETENTION AND HEARING

Comes now the United States of America, by and through its Attorneys, Carrie Costantin, Acting United States Attorney for the Eastern District of Missouri, and John T. Bird, Assistant United States Attorneys for said District, and moves the Court to order Defendant detained pending trial, and further requests that a detention hearing be held three (3) days from the date of Defendant's initial appearance before the United States Magistrate pursuant to Title 18, United States Code, §3141, et seq.

As and for its grounds, the United States of America states as follows:

1. Defendant is charged with one count of armed carjacking and two counts of attempted armed carjacking, in violation of Title 18, United States Code, Section 2119; and two counts of brandishing and one count of discharging a firearm in furtherance of those crimes of violence, in violation of Title 18, United States Code, Section 924(c).

2. Accordingly, a rebuttable presumption arises pursuant to Title 18, United States Code, Section 3142(e)(3) that there are no conditions or combination of conditions which will reasonably assure the appearance of the defendant as required, and the safety of any other person and the community.

WHEREFORE, the United States requests this Court to order Defendant detained prior to trial, and further to order a detention hearing three (3) days from the date of Defendant's initial appearance.

Respectfully submitted,

CARRIE COSTANTIN
Acting United States Attorney

/s/ John T. Bird
JOHN T. BIRD, #37802MO
Assistant United States Attorney